

Immediate Office (IO)

OAQPS and tribes identified six key elements from tribal discussions:

1. The importance of having a high-level tribal advocate in OAQPS while assuring that tribal interests will be recognized throughout the organization;
 2. Health and ecosystem needs of tribal communities are paramount;
 3. OAQPS support for tribes must be flexible and responsive to diverse needs;
 4. Tribal liaisons in each division needs to be understood and effective across OAQPS divisions
 5. GPRA and PART need to reflect the experience gap between tribal programs and federal/state counterparts
 6. OAQPS advocate for tribes in other offices
- This outreach effort by OAQPS leadership -- Greg Green, Laura McKelvey, etc. is greatly appreciated.
 - Support for tribal programs requires great flexibility and adaptability to meet the widely varying needs of tribes and tribal programs. (“One size does not fit all.”)
 - GPRA: Develop program goals and measures that support and accurately reflect tribal progress
 - Provide funding for tribes, not just where risks are identified, but allow for supporting protection and tribes’ right to govern themselves
 - Grants competition precludes tribal information sharing, and tribe-to-tribe support will be less effective in the long run
 - Build capacity to assess air quality and to develop programs tribes want to build
 - Address specific tribal pollution problems
 - Involve tribes early and often in rules and policy
 - Tribes are regulatory partners – culture change needed at OAQPS
 - Develop model rules and regulations
 - Competitive funding works against sharing of information and technical expertise
 - Consortia can maximize resources and support large numbers of tribes, but not every where; need to balance collaboration with sovereignty
 - The consequences of changing the focus of the program from capacity building to “crisis management” due to lack of funds has cost tribal staff, capacity and continuity.
 - Tribal programs and their needs should have high recognition and visibility throughout EPA.
 - Following implementation of OAQPS reorganization, ask for feedback at national meetings to hear what’s working and what’s not
 - Consider an OAQPS/Tribal “air camp” where tribes and OAQPS staff can interact and network

Health and Environmental Impacts Division (HEID)

- Develop comprehensive health assessment - identify data gaps
- Develop tribal specific health risk attributes including local or modular approach
- Be aware of special/local needs of tribes which do not show up in national picture
- One size does not fit all; OAQPS needs to provide technical support to address locally specific needs, including smaller grid models
- Recognize tribe may have pristine air except for one pollutant, e.g. woodsmoke
- Small populations are disproportionately affected by HAP; the current risk models are tailored to large populations
- Support building tribal capacity
- Air pollution is adversely affecting the health of Indian people and the environments of tribal lands – perhaps in ways not captured by Federal regulations. These facts need to be understood and valued by EPA.
- EPA needs to support long-term protection of air quality where tribal communities now enjoy healthful air, e.g. don't tie federal resources to national problem areas
- Tribes are concerned about the proposed PM NAAQS focus on urban settings
- Protection of the ecosystem is vital to tribal communities

Air Quality Policy Division (AQPD)

- Support tribes to influence controls on off-reservation sources that impact tribal lands
- Work with regions to extend radius of new source notification for tribes
- Work on PSD/NSR offset issues – tribes should not bear the burden of air quality control because of a state's mismanagement that used all available increments or offsets–Increments System needs attention
- Provide model rules and example codes and ordinances (control strategies)
- Tribes need to be notified about changes in permits to off-reservation sources
- Tribes need more information/training about innovative emissions control strategies
- Tribes need documents designed for tribes for developing specific regulations
- How can tribes get authority to do inspections?
- SIP training for Oklahoma tribes needed
- Tribal needs too often fall outside national strategies
- Impact on tribal cultural monuments needs to be observed as part of rule development

Sector Policies and Programs Division (SPPD)

- Energy bill encourages development in Indian Country. Strategies need to involve tribes
- CAMR trading needs to provide mechanism for tribes to have access to allowances-need to address hot spots
- Offer tribe help to do technical work on mercury

Air Quality Assessment Division (AQAD)

- Support partnerships for monitoring
- Support source identification in workshops and trainings
- Involve tribes in permitting
- Offer tribe help to do technical work on mercury
- TEISS, software to build inventories, is a success story to be replicated
- Continued support for emission inventory development
- Help tribes to become involved in NCOR, NMS
- Tribal needs too often fall outside national strategies
- More help needed to account for impacts of mobile sources
- Tribal cultures can teach environmental protection; EPA should be willing to learn.
- One size does not fit all; OAQPS needs to provide technical support to address locally specific needs, including smaller grid models
- Some tribes do not have representative data; we need to identify the tribes who need monitors
- More regional support for tribes needed, particularly help with AQS

Outreach and Information Division (OID)

- EPA Offices should work together better – OAQPS should facilitate with other EPA offices to:
 - Assure common priorities between HQ and Regions
 - Share information and responsibility
 - Understand that many tribes have outgrown the need for a liaison between them and the technical staff in EPA – don't be paternalistic
- Involve the tribes in rules and program development **early and often** (official comment periods often are not sufficient)
- Treat the tribes as governments not stakeholders
- Work with ITEP/NTAA and others to support improving tribal information, access to EPA information, and using/interpreting data, e.g. tribal mercury map
- Facilitate information access
 - Consolidate website and links
 - Model rules
 - Guidance, etc
- Help educate tribal leaders (NCAI) and the TOC on air issues
- Be aware of the resource and expertise burden on small tribes (often only 1 FTE)
- Minimize meetings and expectations for participation in meetings and programs (tribes need time to work at their respective offices)
- Understand tribal programs are individuals
- Understand tribes – Coordinate information about tribes and do research before contacting tribes (train EPA staff; don't make the tribes continually train EPA staff)

- Beware of demands on tribes but err on the side of providing too much information; let each tribe decide what is important to them
- Where OAQPS has been successful, provide the model for other offices.
- Provide opportunities for other tribes (don't encourage "survival of the fittest"); look beyond tribes OAQPS knows; and expand the universe of participants.
- Recognize not all tribes get along, nor do all tribes and states
- Educate EPA that the "traditional or national" paradigm doesn't fit tribes
- OAQPS needs to support tribes in handling, understanding and communicating tribal information and air quality issues; help with interpretation and analysis of data is needed
- More regional support for tribes needed, particularly help with AQS
- Make web-site and web-links more easily accessible?
- Expectations of tribal air quality programs must be balanced with availability of resources (which are declining).
- EPA must recognize the serious gap in experience between tribal air quality management programs and federal/state programs.
- EPA support for tribal air programs should be collaborative with ITEP, NTAA, NTEC and other organizations and federal agencies.
- Following implementation of OAQPS reorganization, ask for feedback at national meetings to hear what's working and what's not
- Consider an OAQPS/Tribal "air camp" where tribes and OAQPS staff can interact and network
- Tribes need more information/training about innovative emissions control strategies
- Tribal cultures can teach environmental protection; EPA should be willing to learn.

Possible future steps

- OAQPS needs to present the Reorganization to the tribes and get feed back on the program priorities from the broader group of tribes
- OAQPS could develop a draft strategy for the OAQPS Tribal Program based on discussions
- Provide draft strategy to the tribes for comment
- Finalize and implement the strategy